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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 ELIZABETH DE COSTER, *et al.*, on behalf of
11 themselves and all other similarly situated,

12 Plaintiffs,

13 v.

14 AMAZON.COM, INC., a Delaware corporation,

15 Defendant.

16 DEBORAH FRAME-WILSON, *et al.*, on behalf
17 of themselves and all other similarly situated,

18 Plaintiffs,

19 v.

20 AMAZON.COM, INC., a Delaware corporation,

21 Defendant.

22 CHRISTOPHER BROWN, *et al.*, on behalf of
23 themselves and all others similarly situated,

24 Plaintiffs,

25 v.

26 AMAZON.COM, INC., a Delaware corporation,

27 Defendant.

No. 2:21-cv-00693-JHC

**STIPULATED MOTION AND
ORDER REGARDING SEALING
OF CLASS CERTIFICATION
BRIEFING**

**NOTE ON MOTION CALENDAR:
July 31, 2024**

No. 2:20-cv-00424-JHC

No. 2:22-cv-00965-JHC

STIP. MOT. & ORDER

RE SEALING OF CLASS CERT. BRIEFING

(No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC) - 1

1 The Parties have met and conferred with respect to the upcoming briefing on class
 2 certification, and anticipate that their briefs, declarations, exhibits, and expert reports will quote
 3 from and/or describe in detail a significant amount of information that has been designated as
 4 Confidential or Highly Confidential-Attorneys' Eyes Only by either a Party or Non-Party.
 5 Accordingly, in order to ensure that such materials are treated appropriately under the applicable
 6 protective order, and to reduce burdens on the Court, the Parties, and Non-Parties, pursuant to
 7 LCR 7(d)(1) and 10(g), the Parties and their respective counsel hereby stipulate and agree to the
 8 following procedure for filing and sealing in connection with the class certification briefing,
 9 subject to the Court's approval.

10 1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its class
 11 certification briefs (including any opening, response, and reply briefs), expert declarations or
 12 reports, exhibits, and all other evidence and declarations on which that Party relies (collectively,
 13 "Class Certification Papers") which contain material designated Confidential or Highly
 14 Confidential-Attorneys' Eyes Only by any Party or Non-Party.

15 2. Within four weeks of the filing of Plaintiffs' reply brief, pursuant to LCR 5(g), the
 16 Parties, and any necessary Non-Parties, will meet and confer and, as appropriate, file (1) public
 17 versions of their Class Certification Papers, with necessary redactions, and (2) corresponding
 18 motion(s) to seal pursuant to LCR 5(g)(3). The schedule for filing any such public versions of
 19 the Parties' Class Certification Papers and corresponding motion(s) to seal shall be as follows:

	<i>DE COSTER</i>	<i>FRAME-WILSON</i>	<i>BROWN</i>
20 Reply in Support of 21 Motion to Certify 22 Class ¹	January 24, 2025	May 23, 2025	September 16, 2025
23 Filing of public 24 versions of Class Certification Papers and corresponding Motions to Seal	February 21, 2025	June 20, 2025	October 14, 2025

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 27 1 See *De Coster et al. v. Amazon.com, Inc.*, No. 2:21-cv-00693-JHC, ECF No. 160.

STIP. MOT. & ORDER

RE SEALING OF CLASS CERT. BRIEFING

(No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC) - 2

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19 STIP. MOT. & ORDER

20 RE SEALING OF CLASS CERT. BRIEFING

21 (No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC) - 4

1 IT IS SO ORDERED.
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Dated: July 31, 2024

John H. Chun

4 John H. Chun
5 United States District Judge
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